

Examiner's location of this reference and astute observations regarding the element of figures 2 and 3 will benefit the applicant greatly in obtaining a valid patent. The claims have been amended in light of the Examiner's comments from the outstanding office action. The Examiner's reconsideration of the outstanding rejections is therefore respectfully requested.

#### The Luciano Patent

The Luciano reference illustrates a ring, which is described in column 2, lines 44-46 as being provided with a conventional key chain attachment for storage securement to the book. At first blush, especially when considered without a more detailed reading, this appears to indicate many of the features of applicant's invention. However, a more thorough reading of the description reveals several distinct differences, inherent limitations and drawbacks. In fact, the Luciano reader 11 is very different in structure, method, purpose and motivation from the present invention. More particularly, the Luciano device is not a self-contained question-and-answer unit, it is not designed to withstand the rigors of the environment, and it does not teach nor suggest applicant's teaching method owing to the aforementioned limitations.

With regard to the Luciano reader 11 serving as a self-contained question-and-answer unit, in column 2, lines 22 - 31 Luciano discloses that the device is, in fact, a portable reader which is **designed to display an answer only after a person has reviewed a question within the book**, and it is not intended to initiate the question without the book. The reader requires the book for the display of a question first, and then requires the smart card chip 17 prior to displaying the answer. This requires the book, which is not feasible for the key ring transport of the present invention.

Since the reader must be slid about a chip embedded in the ears protruding from special pages within the book, in lines 39 - 43, Luciano states that the pages of the book are constructed of a relatively or substantially rigid sheet material in order to ensure that neither the pages nor ears protruding from the pages be bent or distorted. Certainly neither the Luciano reader 11, nor the Luciano book 10 which is necessary to complement the reader 11 are designed for, nor intended for the use with a person's keys that the present invention intends. The use of the Luciano device in association with a person's key ring spells disaster, since the device must survive the rigors of a person's pocket, including being unintentionally or unavoidable sat upon, dropped with other contents from a purse or higher elevation, etc., and the added exposure to the elements, as would be associated with an ordinary key chain with keys. This is simply not practical for a sensitive

electronic reader of the nature of Luciano. Furthermore, the transport of a book together with a person's keys is not practical, nor the intent or teachings of Luciano.

The Luciano reader, which includes a display and contacts within the open center, is referenced and described as a smart card reader. The Examiner will recognize that smart card readers are constructed very differently from a smart card which only needs to protect the chip. As the Examiner may know, or can readily confirm, constructing a smart card durable enough to survive both mechanical and environmental exposure typical with being carried about by a person in the ordinary course of activities is quite demanding. Current technology only makes this viable for a chip embedded in a carefully reinforced card. These cards are not open to the elements. The Luciano device 11 is the reader, and is constructed quite differently from known smart cards. Dirt, mud, snow and the like within the open core of the Luciano reader 11 will lead to failure, as will any mechanical stresses, since the open core provides a weakened structure. In addition, the Luciano reader 11 must include a very fragile digital display 21, which is much larger and also much more fragile than any chip embedded within a smart card. The Examiner will recognize that, in order to make smart cards viable, the card structure is solid and quite rigid immediately in the vicinity of the electronic components. One skilled in the art of smart cards and the like will recognize that the Luciano reader 11 is, in fact, a frail and fragile device which is not viable for general transport with a person's keys. Consequently, the teachings that might appear to be inherent or obvious are, in fact, contrary, since Luciano instead inherently cannot withstand exposure to the elements.

The requisite coupling with the book also emphasizes this fact. The key ring, while at first blush appearing to suggest a similar function to applicant's, instead is used simply owing to availability and off-the-shelf manufacture and existence. This is, of course, in addition to the added complexity and inordinate cost associated with this type of reader when compared with applicant's approach and the requisite need for a large and bulky book to fulfill the question and answer function. Consequently, the Luciano reference illustrates a reader which, instead of teaching or suggesting a convenient and omnipresent question-and-answer device of the present invention, instead teaches a bulky book and fragile electronic device which must be handled and treated with care, and which can only be used in the sheltered confines of a school room or study at home. The applicant is grateful to the Examiner for calling this reference to her attention and thereby granting her the benefit of the opportunity to respond and evaluate the merits of the present invention with Luciano to contrast with. By way of the present amendment, the many benefits and features of the

present invention are now more clearly recited herein.

### The Present Invention

The present invention combines features not illustrated or taught in the prior art, including Luciano and Shea, which are now more clearly recited in the present claims. In particular, independent claim 1 has now been amended to specifically recite the key in association with the key ring, the fact that a plurality of tags are fabricated from a durable and weather resistant planar material, and the fact that the challenge is displayed on a surface with the answer normally concealed when the challenge is visible. The use of a plurality of tags is significant, since this enables the word-a-day concept of the invention without limiting the invention for use with a book or the like as illustrated in both Luciano and Shea. The present invention is truly portable, durable, of low cost, and readily used any place, at any time, even in the rain, snow, or extreme temperatures.

Independent claim 7 has now been amended to include vocabulary words printed on one surface of the tags, and definitions on a second surface opposed to the vocabulary words. This ensures that the user can glance at the word and be challenged to recall the definition, rather than seeing both together as is done with the Luciano reader. In addition, claim 7 now specifically recites that the key ring, key and tag are transported through the natural elements without shelter, a feat which is not possible with Luciano.

Independent claim 11 has been amended to more specifically recite a plurality of planar paper-based tags, and also now recites that the printing is on two opposed surfaces. Additionally, the key, key ring and tags are positively recited as being retained to each other, and transportable through the elements. Once again, these features, as mentioned above with reference to Luciano, are not possible with the Luciano invention.

The dependent claims have been amended to correspond to the changes in the independent claims. In addition, several new claims are included which are believed to further distinguish the present invention from the prior art.

The amendments referenced herein are, of course, in combination with the other features of the invention which are also recited in the claims. By way of the present amendment, the applicant has now much more clearly distinguished from the prior art such as Luciano and Shea, and the applicant appreciates the Examiner calling attention to these references.

These amendments are believed to place the present application in condition for allowance,

and no new matter is introduced. A clean set of claims, without the markings that show the changes made, is attached herewith for entry as required under the new rules of practice. An additional marked copy of the claims is provided for the Examiner as required. The Examiner is therefore respectfully requested to reconsider the rejection and pass this application to allowance. If there remain any open issues in this application which may be resolved telephonically, the Examiner is respectfully requested to call the undersigned at 320-363-7296.

Sincerely,

A handwritten signature in black ink, appearing to read 'Albert W. Watkins', with a stylized flourish at the end.

Albert W. Watkins

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Enc.